

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAJAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS, J.
TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of THE HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

EXHIBIT 1

DECLARATION OF JANE O. SHULER, ESQ.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAJAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS, J.
TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of THE HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

**DECLARATION OF
JANE O. SHULER, ESQ.**

JANE O. SHULER, hereby declares the following to be true under penalty of perjury under 28 U.S.C. § 1746:

1. I am competent to testify to and have personal knowledge of the matters stated in this declaration. As to those matters stated on information and belief, I believe them to be true.

2. I am an attorney licensed in the State of South Carolina and I currently serve as the Chief Legal Counsel for the House of Representatives Legislative Ethics Committee (the “Ethics Committee”).

3. I have been counsel to the Ethics Committee since February 2015 and Chief Legal Counsel since September 2017.

4. In my role as Chief Legal Counsel to the Ethics Committee, I am aware of the Ethics Committee’s activities, including the complaints it receives, the investigations it conducts, the advisory opinions it issues, and the enforcement actions it takes.

5. As Chief Legal Counsel, I am primarily the one responsible for drafting advisory opinions on behalf of the Ethics Committee.

6. As of the date of this declaration, I have not been asked by any Member of the House of Representatives to draft an advisory opinion regarding the South Carolina Freedom Caucus.

7. As of the date of this declaration, I have not drafted, and the Ethics Committee has not issued, an advisory opinion concerning the South Carolina Freedom Caucus or its compliance with campaign finance law.

8. To my knowledge, the Ethics Committee has not issued an advisory opinion that directly addresses the prohibition on legislative special interest caucus' ability to engage in "activity that would influence the outcome of an election or ballot measure," as defined in S.C. CODE ANN. § 2-17-10(21).

9. As of the date of this declaration, I am not aware of any complaint, investigation, or enforcement action by the Ethics Committee related to the South Carolina Freedom Caucus or any of its members.

10. As of the date of this declaration, I am not aware of any criminal referrals, reprimands, other sanctions by the Ethics Committee related to the South Carolina Freedom Caucus or any of its members for any of the statutes at issue in the Complaint.

Signed under penalty of perjury this 26th day of April, 2023.



Jane O. Shuler